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October 19, 2012

VIA REGULAR MAIL AND FACSIMILE

Robert L Geltzer
1556 Third Avenue
Suite 505
New York, NY 10128
Fax: 212-410-0400
(USPS – 0312 0860 0001 6644 6168)

Re: Brizinova and Soshkin
EDNY Bankruptcy Chapter 7: 12-42935

Mr. Geltzer:

I am of counsel to Irina Lust, the attorney representing above mentioned debtors.

On September 10, 2012, you filed an application for a Rule 2004 examination, which was granted on October 4, 2012. On September 21, 2012, a motion to compel abandonment was filed, notice of which was then amended on September 24, 2012, that you opposed on October 17, 2012.

The abandonment motion is a contested matter, and therefore, Federal Rules of Civil Procedure supercede Rule 2004, making the examination pursuant to Rule 2004 inappropriate.

Due to time constraints, I ask that you withdraw your Rule 2004 examination notice on or before October 23, 2012, and proceed pursuant to applicable Rules of Federal Procedure in order to avoid unneeded motion practice, and allow my clients proper protections and rights that are otherwise unavailable under Rule 2004.

An formal objection mentioning the same is being mailed and faxed to you, but will not be electronically filed with the Court.

If you have any questions, my contact information is above.

Thank you.



Roman Leonov, Esq.